

**CHINA MOBILE INTERNATIONAL LIMITED PRIVACY STATEMENT  
IN RELATION TO  
COLLECTION OR USE OF PERSONAL INFORMATION FOR  
RECRUITMENT AND HUMAN RESOURCES MANAGEMENT PURPOSE**

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**GENERAL**

This statement (this "**Statement**") provides information on the obligations and policies of China Mobile International Limited, its subsidiaries, affiliates, and associated companies (collectively, the "**Company**") under the Hong Kong SAR Personal Data (Privacy) Ordinance - Cap.486 (the "**Ordinance**") and, where applicable, privacy legislation of other jurisdictions, including but not limited to, the EU's General Data Protection Regulation (Regulation EU2016/679, the "**GDPR**") (collectively, "**Other Privacy Legislations**"). All individuals who submit an application to the Company in respect of recruitment and all employees of the Company upon accepting offer of employment shall be deemed to have consented to their personal data to be collected, shared or howsoever used or handled in accordance with this Statement. To the extent the Other Privacy Legislations applies to the processing of such applications, the processing of personal data is done in the legitimate interests of the Company.

This statement specifically addresses the Company's obligations in respect of the data privacy laws of the Hong Kong SAR which is one of the most developed data protection regimes worldwide. The Company believes the principles embedded in the Ordinance offer no less protection in personal data privacy than those in other jurisdictions. As such, the Company undertakes to apply, where practicable, those principles and the processes set out herein to its operations globally. This policy also addresses, where required, the requirements of Other Privacy Legislations.

Where the Company's operations are subject to privacy legislation other than that of Hong Kong SAR, then this policy shall be applied in so far as practicable and consistent with such local legislation. For further details on the Company's compliance with the Ordinance and any other privacy legislations, please contact the Company's Chief Compliance Officer with details listed in "CONTACT" section at the end of this Statement.

Throughout this policy, the meaning of the term "personal data" is as defined in the Ordinance and, where applicable, the GDPR.

**COMPANY CORPORATE POLICY**

The Company shall fully comply with the obligations and requirements of the Ordinance and, where applicable, the Other Privacy Legislations. The Company's officers, management, and members of employee shall, at all times, respect the confidentiality of and keep safe any and all personal data collected and/or used and/or stored and/or transmitted for, or on behalf of, the Company.

The Company shall ensure all collection, storage, transmission and other processing or usage of personal data by the Company shall be done in accordance with the obligations and requirements of the Ordinance and, where applicable, the Other Privacy Legislations.

Where an individual legitimately requests access to and/or correction of personal data relating to that individual, held by the Company, then the Company shall provide and/or correct such

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data in accordance with the time and manner stipulated within the Ordinance and, where applicable, the Other Privacy Legislations.

**STATEMENT OF PRACTICES**

**INFORMATION COLLECTION FOR RECRUITMENT**

In connection with the recruitment process, job applicants may provide sufficient personal data such as resume so that the Company may, as appropriate and/or applicable:

- a) Assess the applicant's relevancy for the position being applied for;
- b) Assess the applicant's suitability for other positions the Company may have available;
- c) Determine remuneration and benefit;
- d) Verification of credentials and/or experiences; and
- e) Perform security vetting and/or integrity checking.

At a minimum, such personal data will include:

- a) Identification information, including the applicant's name, Hong Kong Identity Card /passport numbers (or other unique identity number in other jurisdictions) and contact details, including postal/email address(es) and telephone number(s);
- b) Date of birth;
- c) Previous employment and relevant experience;
- d) Education;
- e) Professional qualification;
- f) Relevant training; and
- g) Eligibility to work in country.

Additional information may also be required subject to the nature of the position being applied for.

The applicant is responsible for ensuring all personal data they provide is accurate, valid and complete. Any attempt to provide inaccurate information or withhold (or deliberately omit) provision of requested information may cause one or more of the following consequences:

- a) Prevention of making any offer of employment;
- b) Invalidate any offer of employment made; or
- c) Termination of employment (whether with or without notice), if the employment has commenced; or
- d) Reporting to relevant government authority.

The personal data so provided may be used, at the time of recruitment, to persons within the Company and its agents for the purpose of certain projects who are involved in the assessment of the applicant's applicability for the position applied for and/or other positions, which may be, or may become, available within the Company. The Company may share personal information with its subsidiaries world-wide and transfer it to countries in the world where the Company operates in accordance with this Statement. After employment has commenced, the personal

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data may be transferred to third parties, such as investigation agencies, as are necessary to satisfy purposes relating to human resources management.

**RECRUITMENT DATA RETENTION**

The Company shall retain the personal data for as long as is necessary to fulfill the recruitment purposes for which the information is processed or for other valid reasons to retain your personal data such as to comply with its legal obligations, resolve disputes and/or enforce agreements. Personal data collected for job application will be used for recruitment related purposes only. Applicants not being contacted within six weeks may consider their applications unsuccessful. However, applicants may be considered for other suitable positions within the Company for a period of not more than two years. Personal data will be destroyed at any time after three months. Unsuccessful applicant who wish to request the Company no longer uses his/her personal data for processing, please contact us at [hr@cmi.chinamobile.com](mailto:hr@cmi.chinamobile.com).

The personal data of successful applicants shall be retained for and after the duration of their employment by the Company and handled in such manner as described below under the heading of "Employment, Including Post Employment".

**EMPLOYMENT, INCLUDING POST EMPLOYMENT**

In the course of employment by the Company, personal data of employees and their families, as appropriate, will be collected and used on an ongoing basis for various purposes relating to human resources management including but not limited to administering staffing, performance management, training, career development, salary and benefits administration, communication (e.g. Company news, staff benefit offerings and promotions), medical benefits, provident fund administration, insurance, taxation, welfare and providing information in compliance with legal requirements. Personal data will be transferred to internal departments, intra-company, and/or to other third parties (e.g. payroll administrators, insurance companies) as deemed necessary by the Company for the purposes of which the data are collected.

The Company retains certain personal data of employees when they cease to be employed by the Company (and such data will be retained for no longer than seven years after their cessation of employment unless there is a subsisting reason that obliges the Company to retain the data for a longer period; or the former employee has given prescribed consent for the data to be retained beyond seven years). Such data are required for any residual employment-related activities of the former employee including, but not limited to:

- a) The provision of job references upon consent by the former employee;
- b) Processing applications for re-employment;
- c) Matters relating to retirement benefits; and
- d) Allowing the Company to fulfil contractual or statutory obligations.

Further details regarding the Company's policies and practices in respect of its handling of personal data relating to its employees, including post-employment, please contact us at [hr@cmi.chinamobile.com](mailto:hr@cmi.chinamobile.com). They are also available to the Company's employees from their respective Human Resources representative.

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**TRANSFER OF PERSONAL DATA**

At times it may be necessary and/or prudent for the Company to transfer certain personal data to locations other than the Hong Kong SAR (e.g. for data backup) in order to carry out the purposes, or directly related purposes, for which the personal data are collected. All personal data are encrypted during transmission. By submitting job applications or entering into employment relationship with the Company, candidates or employees have consented to such transfer which will be performed in compliance with the requirements of the Ordinance and, where applicable, the Other Privacy Legislations.

**SECURITY OF PERSONAL DATA**

Physical records containing personal data are securely stored in locked areas and/or containers when not in use.

Electronical records are stored and proceed on computer systems, such as Human Resources Management System (the “HRMS”) and storage media to which access is strictly controlled and/or are located within restricted areas.

Access to records and data without appropriate management authorization are strictly prohibited. Authorizations are granted only on a "need to know" and “need to use” basis. Only authorized employee trained on our privacy policies is permitted to access the physical or electronical records.

Where the Company holds, uses and/or transmits personal data, the data will be adequately protected from accidental and/or unauthorized disclosure, change and/or destruction.

**ACCESS AND CORRECTION OF PERSONAL DATA**

Under the terms of the Ordinance and, where applicable, the Other Privacy Legislations, job applicants and employees (current or former) have the right to:

- a) Ascertain whether the Company holds any personal data relating to them and, if so, obtain copies of such data (“right of access”);
- b) Require the Company to correct personal data in its possession which is inaccurate for the purpose for which it is being used by means of a data access request (right of correction); and
- c) Ascertain the Company's policies and practices in relation to personal data, which are those policies and practices set out in their entirety herein.

The said right to access personal data can be exercised by:

- a) Completing the "Data Access Request Form" as prescribed by the Privacy Commissioner for Personal Data under the Ordinance - see “Note 1” below;
- b) Sending the completed Form, along with appropriate proof of identity (a copy of the applicant's Hong Kong Identity Card or Passport) and the prescribed fee to the Company's Chief Compliance Officer with details listed in “CONTACT” section at the end of this Statement.

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The Company will, upon satisfying itself of the authenticity and validity of the access request, make every endeavour to comply with and respond to the request within the period set by the Ordinance (i.e. within 40 days after receiving the request) and, where applicable, the relevant requirements provided under the Other Privacy Legislations.

If the accessed data contains any incorrect information, the Company will accept written request for correction which can be sent to the Company's Chief Compliance Officer with details listed in "CONTACT" section at the end of this Statement., specifying the data obtained through the Data Access Request mentioned above which needs to be corrected. Satisfactory proof and/or explanation of the inaccuracy is essential before the Company would consider correcting the specified data.

**No Limitation of Rights under PDPO**

Nothing in this Statement shall limit any rights of a data subject under the Ordinance and, where applicable, the Other Privacy Legislations.

**CHANGES TO PRIVACY STATEMENT**

The Company may update this Statement, from time to time, with any other specific clause and/or the Statement when necessary.

**CONTACT**

All enquiries regarding the Company's compliance with obligations under the Ordinance and, where applicable, the Other Privacy Legislations should be addressed to:

**Chief Compliance Officer  
Level 30, Tower 1, Kowloon Commerce Centre,  
No. 51 Kwai Cheong Road, Kwai Chung, New Territories, Hong Kong**

Or via email to:  
hr@cmi.chinamobile.com

*(If there is any inconsistency or conflict between the English and Chinese version of this Statement, the English version shall prevail.)*

*Note 1: Please contact the Company's Chief Compliance Officer to obtain a copy of the "Data Access Request Form". Please note that, as permitted by the Ordinance, we may apply an administrative charge for providing access to your personal information in response to such request.*